

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PITTSBURGH LOGISTICS SYSTEMS, INC.,

Plaintiff,

v.

TRAFFIX USA, INC.,

Defendant.

Case No. 1:22-cv-4323

**PITTSBURGH LOGISTICS SYSTEMS, INC.’S MOTION FOR
ENTRY OF DEFAULT AGAINST TRAFFIX USA, INC.**

In accordance with Federal Rule of Civil Procedure 55(a), Plaintiff Pittsburgh Logistics Systems, Inc. (“PLS” or “Plaintiff”), requests an entry of default against Defendant Traffix USA, Inc. (“Traffix” or “Defendant”). In support, the Plaintiff states as follows:

1. On August 16, 2022, PLS filed its Complaint against Traffix. Decl. of R. Hurley (“Hurley Decl.”), a true and accurate copy of which is attached hereto as **Exhibit A**, ¶ 3. This is an action for Tortious Interference with a Contract; Tortious Interference with Business Relationships; Violation of Illinois Trade Secrets Act; and Violation of Defend Trade Secrets Act (18 U.S.C. § 1836).
2. Traffix is a Delaware corporation with its principal place of business in Chicago, Illinois. Hurley Decl., ¶ 4.
3. Defendant Traffix has been duly served with process by personal process server on August 18, 2022. Hurley Decl., ¶ 5. A copy of the process server’s affidavit was filed with the Court on August 19, 2022, and is attached hereto as **Exhibit B**. Hurley Decl., ¶ 5.

4. The Court has jurisdiction over the parties to this case and the subject matter of this litigation.
5. Traffix's deadline to respond to the Complaint was September 8, 2022 and it has failed to respond.
6. As of the date of this motion, no attorney has filed an appearance for Traffix. Hurley Decl., ¶ 6. Further, no attorney has contacted Plaintiff's counsel claiming to represent Traffix, nor has any attorney sought an extension of time to respond to the Complaint. Hurley Decl., ¶ 7.
7. Fed. R. Civ. P. 55(a) authorizes a default to be entered against any party who fails to plead or otherwise defend within the 21 days allowed by Rule 12(a). PLS is therefore entitled to entry of default against the Defendant.

WHEREFORE, PLS respectfully requests that this Court grant its request for entry of default against the Defendant.

PITTSBURGH LOGISTICS SYSTEMS, INC.

Date: September 13, 2022

By: /s/ Colby A. Kingsbury
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PITTSBURGH LOGISTICS SYSTEMS, INC.’S MOTION FOR ENTRY OF DEFAULT AGAINST TRAFFIX USA, INC.** via Registered Certified Mail, Return Receipt Requested upon the Registered Agent of Defendant, Traffix, USA, Inc. at:

Illinois Corporation Service Company
801 Adlai Stevenson Drive
Springfield, IL 62703

On the 13th day of September, 2022.

/s/ Colby A. Kingsbury